

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-80116-CR-CANNON/McCabe

UNITED STATES OF AMERICA

vs.

RYAN WESLEY ROUTH,

Defendant.

**PARTIES' JOINT NOTICE OF FILING REVISED PROPOSED ORDER FOLLOWING
HEARING ON GOVERNMENT'S MOTION TO PRECLUDE LEGALLY PROHIBITED
AND FACTUALLY BASELESS DEFENSES (ECF 119)**

As directed by the Court, the parties consulted on possible areas of disagreement, and are now jointly submitting the attached proposed Order to the Court. It reflects our joint understanding, having reviewed the May 14, 2025 hearing transcript, of what the Court ordered at the time regarding the Government's Motion to Preclude Legally Prohibited and Factually Baseless Defenses (ECF 119).

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/ John Shipley
John C. Shipley
Florida Bar No. 69670
Christopher B. Browne
Florida Bar No. 91337
Maria K. Medetis-Long
Florida Bar No. 1012329
Assistant United States Attorneys

U.S. Attorney's Office
Southern District of Florida
99 Northeast 4th Street, 8th Floor
Miami, Florida 33132-2111
Telephone: (305) 961-9111
E-mail: John.Shipley@usdoj.gov

SUE BAI
SUPERVISORY OFFICIAL PERFORMING THE
DUTIES OF THE ASSISTANT ATTORNEY
GENERAL FOR THE NATIONAL SECURITY
DIVISION

By: /s/ James Donnelly
James Donnelly
Court ID No. A5503331
Department of Justice, National Security Division
950 Pennsylvania Avenue, NW
Washington, DC 20530
Telephone: (202) 514-0849
Email: james.donnelly3@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF on May 15, 2025.

/s/ John C. Shipley
Assistant United States Attorney